

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

WILENTZ, GOLDMAN & SPITZER, P.A.  
90 Woodbridge Center Drive  
Suite 900, Box 10  
Woodbridge, NJ 07095  
732-636-8000  
DAVID H. STEIN, ESQ.  
*Attorneys for Debtor*

In Re:

**DUKAT, LLC, ,**

*Debtor.*

Case No.: 21-14934 (KCF)

Chapter 11 (Subchapter V)

Hon. Kathryn C. Ferguson

Hearing date: October 26, 2021  
at 10:00 a.m.

**NOTICE OF DEBTOR'S MOTION TO ESTIMATE AND/OR FIX CLAIM  
OF TARVISIUM HOLDINGS, LLC AND 45N12E, LLC PURSUANT TO 11  
U.S.C. § 502(c)(1) AND FED. R. BANKR. P 3018 (a)**

**TO:** Seth M. Rosenstein  
Ansell Grimm & Aaron, P.C.  
365 Rifle Camp Road  
Woodland Park, NJ 07424  
*Attorneys for Tarvisium Holdings, LLC and  
45N12E, LLC*

**PLEASE TAKE NOTICE** that on October 26, 2021, at 10:00 a.m., or as soon thereafter as counsel may be heard, Dukat, LLC (the "Movant"), by and through its counsel, Wilentz, Goldman & Spitzer, P.A., shall move before the Honorable Kathryn C. Ferguson, United States Bankruptcy Judge, at the United States Bankruptcy Court for the District of New Jersey, U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for entry of an Order pursuant to Section 502(c)(1) of the Bankruptcy Code and Fed. R. Bank. P.3018(a) estimating and/or fixing the claim of Tarvisium Holdings, LLC and 45N12E, LLC (the "Motion").

**PLEASE TAKE FURTHER NOTICE** that in support of the within Motion, the Movant shall rely upon the Certification of David H. Stein, Esq. and Memorandum of Law submitted herewith, oral argument of counsel, if any, the record of the proceedings, and such testimony as the Court shall require or allow.

**PLEASE TAKE FURTHER NOTICE** that, objections, if any, to the relief requested must be made in writing and in the form prescribed by the Federal Rules of Bankruptcy Procedure and the District of New Jersey Local Bankruptcy Rules, and must be filed with this Court and served upon counsel to the Movant, Wilentz, Goldman & Spitzer, 90 Woodbridge Center Drive, Woodbridge, New Jersey 07095 (**Attn: David H. Stein, Esq.**) so as to be received within the time required by the Rules of Court.

**PLEASE TAKE FURTHER NOTICE** that, in the event that timely objections are not filed with the Court and served upon the undersigned counsel as provided in District of New Jersey Local Bankruptcy Rule 9013-2(a)(2), the Motion shall be deemed uncontested and the Court may, in its discretion, grant the requested relief.

**PLEASE TAKE FURTHER NOTICE** that, in accordance with District of New Jersey Local Bankruptcy Rule 9013-3, unless timely objections are filed and served upon the appropriate parties, the applicant submits to disposition on the papers.

**WILENTZ, GOLDMAN & SPITZER, P.A.**  
*Attorneys for Debtor, Dukat, LLC*

*/s/ David H. Stein*

By: \_\_\_\_\_  
DAVID H. STEIN, ESQ.

Dated: September 23, 2021